



VT iDirect's Environmental Responsibility - WEEE Compliance

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1 of 8

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REVISION HISTORY

| Revision | Date | Notes | Author |
|----------|------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|--------|
| 1.00 | 07/03/2013 | First Draft | LB |
| 1.01 | 07/22/2013 | Revision Draft | DS |
| 2.00 | 07/29/2016 | Updated RoHS & WEEE Directives. Change wording on customer contacting VT iDirect. Changed Historic to Historical. Changed Old WEEE to Historical WEEE. | MS |
| 2.01 | 09/22/2016 | Update WEEE contact e-mail, update phone extension. | MS |



TABLE of CONTENTS

| | |
|-------------------------------------------------------------|----------|
| TABLE OF CONTENTS..... | 3 |
| 1 SCOPE | 4 |
| 1.1 PURPOSE..... | 4 |
| 1.2 AUDIENCE | 4 |
| 2 REFERENCE DOCUMENTS | 4 |
| WEEE EU STANDARD | 4 |
| 3 WHAT IS WEEE? | 4 |
| 4 PRODUCT BY DESIGN | 5 |
| 5 WEEE MARKING | 5 |
| 6 INFORMATION FOR USERS | 5 |
| 7 WEEE FROM PRIVATE HOUSEHOLDS | 6 |
| 8 WEEE FROM USERS OTHER THAN PRIVATE HOUSEHOLDS..... | 7 |
| 9 WEEE TREATMENT | 8 |
| 10 INFORMATION TO RECYCLERS..... | 8 |



1 Scope

1.1 Purpose

The purpose of this document is to outline the mandatory Waste Electrical and Electronic Equipment (WEEE) compliance strategy for iDirect imported electronic products into regulated market place.

1.2 Audience

This document is intended for iDirect customers looking for detail information on WEEE Compliance and the necessary steps they must need to take for complying WEEE Directive.

2 Reference Documents

The Waste Electrical and Electronic Equipment Directive (WEEE Directive) is the European Community directive 2012/19/EU on waste electrical and electronic equipment (WEEE) which, together with the RoHS Directive 2011/65/EU European Standard EN 50419.

3 What is WEEE?

European Directive 2012/19/EU of February 2014, known as the Waste Electrical and Electronic Equipment (WEEE) Directive, requires EU Member States to implement national legislation making the producers (i.e. manufacturers, importers and certain other sellers) of certain categories of Electrical and Electronic Equipment (EEE) responsible for the costs of recovering and recycling their products when they reach the end of their working life, and for applying markings and providing information to facilitate this process.

The Waste Electrical and Electronic Equipment Directive (WEEE) apply to companies that manufacture, sell, distribute, or treat electrical and electronic equipment in the European Union. WEEE covers all large and small household appliances, IT equipment, radio and audio equipment, electrical tools, and telecommunication equipment.

The directive aims to reduce the waste arising from electrical and electronic equipment and to improve the environmental performance of all those involved in the lifecycle of these products. According to this directive producers have a certain responsibility regarding their products in the waste phase. VT iDirect is offering its clients a take-back solution for iDirect waste products all over Europe.

As a global company with strong corporate values, VT iDirect is taking measures to ensure it complies with environmental directives issued by the European Commission in February of 2014 and subsequent directives issued by other agencies. The directives are aimed at



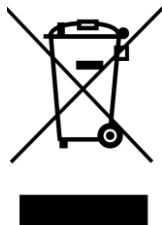
tackling the fast increasing waste stream of electrical and electronic equipment as well as reducing the total quantity of waste at landfill sites in both the European Union (EU) and worldwide. There are several obligations imposed on producers of electrical and electronic equipment, such as VT iDirect manufactured equipment. VT iDirect compliance approach for each of these obligations is provided below.

4 Product by Design

VT iDirect uses a standard design for recycling to ensure that its electrical and electronic equipment meets the WEEE dismantling and recovery requirements. VT iDirect also design and develop products that meet RoHS compliance standards to ensure the design does not contain environmental hazardous material.

5 WEEE Marking

All VT iDirect products that are subject to the WEEE Directive (shipped after July 1, 2006) are compliant with the WEEE marking requirements. The products are marked with the crossed out wheeie bin WEEE symbol in accordance with European Standard EN 50419.



6 Information for Users

According to the requirements of European Union member state WEEE legislation, the following user information is provided to customers for all VT iDirect branded products subject to the WEEE directive.

“This symbol on the product or on its packaging indicates that this product must not be disposed of with your other household waste. Instead, it is your responsibility to dispose of your waste equipment by handing it over to a VT iDirect designated collection point for the recycling of waste electrical and electronic equipment. The separate collection and recycling of your waste equipment at the time of disposal will help to conserve natural resources and ensure that it is recycled in a manner that protects human health and the environment. For more information about where you can drop off your waste equipment for recycling, please contact your local city office, your household waste disposal service or the shop where you purchased the product.”



7 WEEE from Private Households

Typically, VT iDirect products are not for private household markets. In an unlikely event of distribution, according to the timelines and requirements of member state WEEE legislation, VT iDirect fulfills its obligations for the financing of collection, treatment, recovery and environmentally sound disposal of WEEE from private households deposited at collection facilities.

Under the EU Waste Electrical and Electronic Equipment (WEEE) Regulations, for equipment that you buy from VT iDirect after August 2005, VT iDirect is required to finance the collection, treatment, recycling and recovery of WEEE that your new purchase replaces, on a one-for-one, like-for-like basis. The old equipment that your new purchase from VT iDirect replaces is referred to as Historical WEEE.

Under the EU WEEE Regulations, VT iDirect is also required to finance the collection, treatment, recycling and recovery of any new electrical and electronic equipment that you buy from VT iDirect after August 2005, when that new equipment eventually becomes waste. This is referred to as New WEEE.

Customers may contact VT iDirect at rma@idirect.net or by calling (888) 362-5475, extension 8047 to make arrangements to turn in Historical or New WEEE.

VT iDirect products are very competitively priced. Any new increase in operating costs for manufacturers such as VT iDirect is normally reflected in a price increase in the product. However, instead of increasing the prices of our products VT iDirect has decided to share these new environmental costs directly with our customers. We believe in being transparent with you on any new environmental costs that our products need to address.

Our approaches to sharing these new environmental costs are:

- VT iDirect Inc. has contracted with Turtle Wings an ISO1401 and R2 certified recycler, in the US to properly dispose of all electronic equipment under the WEEE program.
- Returns from any US location; Customer pays all freight charges to VT iDirect's warehouse.
- Returns from foreign locations; Customer pays all shipping charges to the iDirect warehouse when the value of the commercial invoice is under \$2,000 USD.
- Customer will pay shipping charges to the US port of arrival.
- VT iDirect Inc. will be responsible for import customs clearance process and final delivery costs.
- VT iDirect Inc. pays for the costs of treatment, recycling and recovery requested by recycler to of the WEEE to meet the targets set by the WEEE Regulations.



- VT iDirect Inc. pays for the costs of data management and reporting to the Environment Agency to demonstrate compliance with all administrative requirements of the WEEE Regulations.

8 WEEE from users other than private households

Subject to applicable laws and where replacement products are being supplied by VT iDirect, we will ensure the proper recycling of waste resulting from any brand of non-consumer electrical and/or electronic items purchased before August 13th 2005 arising at VT iDirect customers' (other than private householders) locations in the European Union. For VT iDirect products sold after August 13th 2005, VT iDirect will ensure the proper recycling of waste resulting from those products arising at the customer's locations in the European Union.

The costs of recycling described above are free once products are returned to VT iDirect. The costs of collecting such waste from customer premises are not included in VT iDirect's standard offer; however VT iDirect can provide either a chargeable collection service, or addresses of locations where customers can return their products.

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9 WEEE Treatment

In accordance with community waste legislation, VT iDirect confirms that treatment and recycling of WEEE done on behalf of VT iDirect, either by a collective scheme or individually, is carried out in accordance with the requirements of the WEEE directive, as set out in the implementing legislation of the member states, including requirements respecting special treatment for specified parts and overall recovery rates achieved.

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10 Information to Recyclers

As required by the WEEE Directive, VT iDirect provides reuse and treatment information for each type of new WEEE put on the market within one year after the equipment is put on the market. VT iDirect makes the required information available to reuse centers by the date specified in member state legislation, typically within one year after the new products have been put on the market or for all products sold after August 13th, 2005.